## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NORTH DAKOTA

UNITED STATES OF AMERICA

SUPERSEDING INDICTMENT

v.

Case No. 1:20-cr-154

TYREE DOMINIQUE MELHOUSE; TEREZ MALIK MELHOUSE; and PAIGE REBEKAH HOLMES Violations: 21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(vi), and 846; and 18 U.S.C. § 2

#### COUNT ONE

## Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances

The Grand Jury Charges:

Beginning in or about 2015 and continuing until in or about April 2020, in the District of North Dakota, and elsewhere,

### TYREE DOMINIQUE MELHOUSE; TEREZ MALIK MELHOUSE; and PAIGE REBEKAH HOLMES,

knowingly and intentionally combined, conspired, confederated, and agreed together and with others, both known and unknown to the grand jury, to distribute and possess with intent to distribute: (i) a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance; and (ii) a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

#### Overt Acts

In furtherance of this conspiracy and to effect and accomplish the objects of it, one or more of the conspirators committed the following overt acts:

- 1. It was a part of said conspiracy that the defendants and others would and did distribute and possess with intent to distribute, mixtures and substances containing a detectable amount of heroin and fentanyl, Schedule I and Schedule II controlled substances respectively, in and near Minot, North Dakota, and elsewhere;
- 2. It was further a part of said conspiracy that the defendants and others would and did attempt to conceal their activities;
- 3. It was further a part of said conspiracy that the defendants and others would and did use United States currency in their drug transactions;
- 4. It was further a part of said conspiracy that the defendants and others would and did use telecommunication facilities, including cellular telephones, to facilitate the distribution of heroin and fentanyl; and,
- 5. It was further a part of said conspiracy that one or more conspirators traveled between North Dakota and other states to obtain, transport, and distribute mixtures and substances containing a detectable amount of heroin and fentanyl, Schedule I and Schedule II controlled substances respectively;

In violation of Title 21, United States Code, Section 846; <u>Pinkerton v. United States</u>, 328 U.S. 640 (1946).

#### **COUNT TWO**

# Possession with Intent to Distribute a Controlled Substance – Fentanyl (40 grams or more)

The Grand Jury Further Charges:

On or about August 14, 2020, in the District of North Dakota,

## TEREZ MALIK MELHOUSE and PAIGE REBEKAH HOLMES,

individually, and by aiding and abetting, knowingly and intentionally possessed with intent to distribute a mixture or substance containing a detectable amount of Fentanyl (40 grams or more), a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(vi), and Title 18, United States Code, Section 2.

A TRUE BILL:

/s/ Foreperson	
Foreperson	

/s/ Drew H. Wrigley
DREW H. WRIGLEY
United States Attorney

JAE/sj